



October 13, 2022

Washington State Building Code Council  
PO Box 41449  
Olympia, WA 98504-1449

Re: Comments on proposed rule WSR 22-17-149

Dear Chair Doane and Members of the Washington State Building Code Council:

On behalf of the NW Hearth, Patio & Barbecue Association, we are writing to express our organizations deep concerns with the direction the Washington State Building Code Council is taking regarding the ability to have natural gas. While the code does not explicitly prohibit a gas fireplace or back up heating appliance being installed into a home, the credit options table and other changes in the code implicitly will keep gas from being available in new residential and multi-family construction.

NWHPBA opposes this because not only has there been no direction from the Legislature to eliminate natural gas in new construction – either directly or indirectly – our organization is also very concerned about the ability for homeowners to have what they need to safely “shelter in place” during weather events, public health crises or other types of events. We would like to see the residential energy code explicitly allow gas fireplaces or other gas-powered hearth products to be installed in new residential construction without impacting the energy credits for the home for the following reasons:

- Back up heating in Washington State homes is important. According to a 2019 study from the Institute for Health Metrics and Evaluation, four times as many people were killed from cold temperatures than from warm temperatures. While the focus of the energy code is on electrification and cooling via heat pumps, the council is ignoring the need to ensure resilient heating systems in our homes. Climate change may bring warmer temperatures in the summer, the reality in the Northwest could still be significant fall and winter storms that knock out power to homes during cold months.
- Pressure on the electric grid, along with demand from other states such as California for increased power, will put homes in Washington state in jeopardy of power outages – not when it is warm, but when it is colder. Residents in Washington utilize more electricity during cold weather events. Even with heat pumps, the need to provide supplemental heating during a cold snap will be significant. Our building code should not disincentivize clean burning back up options such as natural gas fireplaces.
- The proposed energy code currently disincentivizes natural gas through the credit options table and the need for builders to achieve a certain number of energy credits. This will result in fewer houses being built with ANY ability to have natural gas run to the home. This will not only reduce the number of gas fireplaces installed in homes originally, it will also reduce the choices

for residents who want to add a supplemental heat option after their house is built – an action that is a reality after power outages occur.

- If no gas line is run to the neighborhood, it would be prohibitively expensive to put in a gas heating fireplace after the house is built.
- Options if there is no natural gas available include:
  - Propane – many neighborhoods would not allow this option because of the closeness of the houses. Setbacks would prohibit this option for many homeowners.
  - Woodstoves or woodpellet stoves – while this would be a viable option for many homeowners, it could be cost prohibitive for low income consumers because newer houses require significantly more expensive venting for these stove – venting that can add \$3000-\$4000 to the cost of the stove. In addition, there are areas around Washington state at risk of being EPA non-attainment areas – such as Yakima – where woodstoves may be a far less viable option than natural gas heating appliances because of the impact on overall air quality. In addition, many neighborhoods may not have easy access to fuel during the times they need to use wood products to heat their homes.

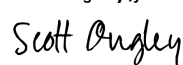
Once again, we believe the Washington State Energy Code should be immediately revised to ensure the ability for homeowners to put back up natural gas heating into their homes in the event of a power outage. Gas fireplaces, gas inserts and freestanding gas stoves (not cooking appliances) remain a viable option for this because

- The fuel is readily accessible when the heating is needed.
- They work effectively during power outages.
- These fireplaces are cleaner burning options for air quality in urban and suburban neighborhoods.
- They are sealed combustion, direct vented appliances so they are safe for homeowners and families.

During emergencies, the first thing our citizens hear from emergency management officials is to “stay at home” or to “shelter in place.” This happened with the recent pandemic. It happens following significant windstorms, and it is often repeated during a winter snow or ice storm in most areas around our state. It is an important instruction to keep people safe. The ability for Washington residents to have homes that can be safe and warm during these events, even with an electrical power outage, is important, not only for the families who are reluctant to leave their home vulnerable, but also so local agencies and shelters do not become overstressed and unable to adequately service citizens.

We appreciate your consideration of this revision and look forward to working with you on this subject.

Sincerely,



FE7E3E87013D49D...

Scott Ongley  
President

DocuSigned by:



512AE1C294C446A...

Edward Hosack  
Government Affairs Chair